

Remarks & Arguments

In the Office Action, the Examiner noted that Claims 1-8 and 10-37 are pending in the application, and that Claims 11-17 and 19-29 are rejected. The Examiner has also noted that Claims 1-8, 10 and 30-37 are allowed, and that Claim 18 is objected to. The Applicants thank the Examiner for indicating the allowable subject matter. By this amendment, Claims 11, 12, 22 and 23 have been amended. Thus, Claims 1-8 and 10-37 are pending in the application. The amendments to the claims do not add new matter to the application. The Examiner's rejections are traversed below.

*Rejections Under 35 U.S.C. 102*

Claims 11, 13-17 and 19-29 stand rejected under 35 U.S.C. 102 as being anticipated by U.S. Patent No. 6,460,172 to Farre. Applicants respectfully traverse the rejection of Claims 1, 13-17 and 19-29 on the basis that the relied upon reference does not teach every element in the independent Claims.

**Claims 11**, as amended, recites a method for configuring a microcontroller that includes "accessing a **text based description** of said dynamically configurable blocks." The Office refers to Figure 1 and its description in Farre to support the assertion that Farre teaches a system that includes "a processor, memories, configurable blocks including digital blocks, analog blocks that are selectable from a set of **library macros** and cells to configure and dynamically reconfigure whole or partial systems." More particularly, the Applicants respectfully point to Farre at col. 3,

lines 31-38 in which Farre discloses that “the invention ... comprises ... a suitable set of CAD tools to easily program it, and a set of library macros and cells which support a number of typical applications to be easily mapped into the FPD and migrated to an ASIC.” Those skilled in the art appreciate that a macro is executable software.

Applicants respectfully assert that Farre does not disclose a “text based description.” In stead, Farre discloses “a set of library macros” that are instead executable software. Applicants therefore submit that Claim 11 is patentable over Farre. Accordingly, Applicants request that the anticipation rejection of Claim 11 be withdrawn and that Claim 11 be allowed.

**Claims 13-17 and 19-21** are allowable by virtue of their dependency on respective base Claim 11, as well as the additional elements they recite. Accordingly, Applicants respectfully request that the anticipation rejection of Claims 13-17 and 19-21 be withdrawn and that Claims 13-17 and 19-21 be allowed.

**Claims 22**, as amended, recites a system for implementing a method for configuring a microcontroller that includes “accessing **a text based description** of a plurality of dynamically configurable blocks.” The Office refers to Figure 1 and its description in Farre to support the assertion that Farre teaches a system that includes “a processor, memories, configurable blocks including digital blocks, analog blocks that are selectable from a set of **library macros** and cells to configure and dynamically reconfigure whole or partial systems.” More particularly, the applicants respectfully point to Farre at col. 3, lines 31-38 in which Farre discloses that “the invention ... comprises ... a suitable set of CAD tools to easily program it,

and a set of library macros and cells which support a number of typical applications to be easily mapped into the FPD and migrated to an ASIC.” Those skilled in the art appreciate that a macro is executable software. Accordingly, Farre does not disclose a “text based description.” Applicants therefore submit that Claim 22 is patentable over Farre and request that the anticipation rejection of Claim 22 be withdrawn and that Claim 22 be allowed.

Claim 23 is allowable by virtue of its dependency on respective base Claim 22, as well as the additional elements it recites. In particular, Farre does not disclose that the “text based description” includes “a text readable non-executable software data structure.” Instead, Farre discloses “a set of library macros” which are executable software. Accordingly, Applicants respectfully request that the anticipation rejection of Claim 23 be withdrawn and that Claim 23 be allowed.

**Claims 24-29** are allowable by virtue of their dependency on respective base Claim 22, as well as the additional elements they recite. Accordingly, Applicants respectfully request that the anticipation rejection of Claims 24-29 be withdrawn and that Claims 24-29 be allowed.

*Rejections Under 35 U.S.C. 103*

Claims 12 stands rejected under 35 U.S.C. 103 as being obvious in view of the combination of U.S. Patent No. 6,460,172 to Farre and U.S. Patent No. 6,578,174 to Zizzo. Applicants respectfully traverse the rejection of Claim 12 on the basis that the relied upon

references do not teach every element and in addition that there is no suggestion or motivation to combine the references.

The Office acknowledges that Farre does not teach or suggest that the description of the dynamically configurable blocks are compliant with the extensible markup language (XML). However, the Office refers to Zizzo at col. 7, 9 to support the assertion that Zizzo teaches “a method and system for chip design using remotely located resources comprising circuit design platform to facilitate the design of an IC by making it easier for designers to locate and incorporate available virtual component blocks into new designs including using a universal data interface format or mark-up language (XML) is preferably used as a primary data interface between the various component of the system and the details XML are well-known to those in the art of computer programming.. The applicants respectfully disagree with the Office’s position, and suggest that the relied upon passages do not support the Office’s assertion. In particular Zizzo only discloses that XML is used to communicate information between remotely located resources. The resources are distributed workstation and servers of the circuit design platform used to design the IC and not the “dynamically configurable blocks” of the IC being designed. Accordingly, if there was a motivation or suggestion to combine the teaching of Farre and Zizzo, the references would instead teach that “a set of library macros” (e.g., a set of executable programs) are communicated between the user workstation and one or more servers 260, 232, 234, 236, 240, 244 using XML as part of the communication protocol (e.g., secure XML tunnels (col., lines 30-33)).

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For each of the reasons set forth above, Applicants respectfully submit that Claim 12 is patentable over Farre in view of Zizzo. Accordingly, Applicants request that the obviousness rejection of Claim 12 be withdrawn and that Claim 12 be allowed.

Conclusion

For all the reasons advanced above, Applicants respectfully submit that the present application is in condition for allowance and that action is earnestly solicited. The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

The Commissioner is hereby authorized to charge any additional fees, which may be required for this amendment, or credit any overpayment, to Deposit Account 23-0085. In the event that an extension of time is required, or may be required in addition to that requested in a petition for an extension of time, the Commissioner is requested to grant a petition for that extension of time which is required to make this response timely and is hereby authorized to charge any fee for such an extension of time or credit any overpayment for an extension of time to Deposit Account 23-0085.

Respectfully submitted,

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